REMARKS

This responds to the office action mailed on April 7, 2008. Reconsideration is respectfully requested in light of the following remarks.

Independent claims 24, 31, 34 and 40 are each rejected under 35 U.S.C. § 102(b) as being anticipated by Flowers (U.S. 5,533,174). These rejections are respectfully traversed for the following reasons.

Independent Claims 24 and 40:

The cited Flowers patent does not teach or suggest the step of "transferring the lacking font structure data and the text data to the designated device," as recited in claim 24, or the step of "transferring both the text data and the font structure data for said not found font identifier to the designed device," as recited in claim 40. An example of this is described in the instant application with reference to Fig 2. In the example shown in Fig. 2, a server 200 maintains a client font list store 210 that includes a list of the client font capabilities for a mobile device 100. When a message, such as an email, is received by the server 200 that is addressed to the mobile device 100, the server 200 determines if the mobile device 100 has the necessary font data stored locally to render the text data in the message. If not, then the server 200 sends augment font data 306 to the mobile device along with the text data that provides the necessary font structure data for the mobile device to render the text. Nothing similar to this is disclosed or suggested by the Flowers patent.

The Flowers patent describes a font server that communicates with workstations and printers in order to print or display text using a specified font. If the font server receives a request to display or print text using a font that is not supported by the necessary printer or workstation, then the font server translates the font into a different font format that is supported. The font server described in the Flowers patent does NOT, however, provide any new font structure data to the workstation or printer to enable them to render text that would not otherwise be supported.

The Office Action rejects each of the independent claims by making the following conclusions regarding the teachings of the Flowers patent[1]:

> Flowers teaches a server that includes a property list which includes font capabilities for client devices (see abstract column 4, lines 50-67 & column 5, lines 1-25). The font server performs all the necessary rendering calculations and manipulations using the fonts, furthermore translating the fonts to a compatible format based on the client devices capabilities/requirements. Flowers describes receiving text data addressed to a device which include text and font identifiers (see column 5, lines 5-15). Also showing that the list is used and compared against the device requirements/capabilities.

The patent owner submits that the above conclusions of the Office Action ignore the language of the claims, and thus fail to establish a *prima facie* rejection under 35 U.S.C. § 102(b). As explained above, claims 24 and 40 each require that necessary font structure data that is determined not to be available on the client device is transferred from the server to the client device. However, the Office Action makes no attempt to establish that these limitations are taught by the cited Flowers patent. Instead, the Office Action concludes that the font server in Flowers "translates the fonts to a compatible format based on the client devices capabilities/requirements." The patent owner respectfully submits that this is not what is recited in the claims. Accordingly, the rejections of independent claims 24 and 40 are improper and should be withdrawn.

Independent Claim 31:

The Flowers patent does not teach or suggest the step of "transferring the test to the device, and operatively refraining from transferring the font structure data to the device in response to determining, in step iii, that the device already has the font data structure," as recited in claim 31. As explained above with reference to the rejections of claims 24 and 40, the font server described in the Flowers patent does not transfer font structure data to a client device, nor does it operatively refrain from doing so upon determining that the client device already has the font structure data necessary to render a specified font. Further, as explained above, the Office Action wholly fails to show correspondence between this claim element and anything in the Flowers patent, and thus does not establish a *prima facie* rejection under 35 U.S.C. § 102(b). The rejection of claim 31 is therefore improper and should be withdrawn.

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[1] The Office Action does not attempt to show how these teachings in Flowers purported correspond to the specific elements of the claims.

<u>Independent Claim 34:</u>

The Flowers patent does not teach or suggest the step of "determining whether another font identifier exists that is the same as said not found font identifier," as recited in claim 34. Again, the Office Action makes no attempt to show correspondence between this claim element and anything disclosed in the Flowers patent. Instead, the Office Action merely recites the exact same portions of the Flowers patent in the rejection of claim 34 as recited in the rejections of independent claims 24, 31 and 40. Nothing cited by the Office Action has any relevance to "determining whether another font identifier exists that is the same as said not found font identifier." Moreover, a proper rejections could not be made because the Flowers patent does not teach anything similar to this. Accordingly, the patent owner respectfully submits that the rejection of claim 34 is improper and should be withdrawn.

For at least the above reasons, the patent owner submits that claims 24-42 are patentable over the cited references and are in condition for allowance. Allowance is therefore respectfully requested.

Respectfully submitted,

JONES DAY

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Joseph M. Sauer (Reg. No. 47,919)
Jones Day
North Point, 901 Lakeside Avenue
Cleveland, Ohio 44114
(216) 586-7506